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August 2, 2022

VIA ECF

Hon. Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: *Primed Pharmaceuticals LLC v. Starr Indemnity & Liability Co.*
21-cv-1025 (SLC)

Dear Judge Cave,

This firm represents Plaintiff Primed Pharmaceuticals, LLC (“Primed”) We write this letter pursuant to Your Honors Individual Practices in Civil Cases I.G.2 and in accordance with the Protective Order entered on June 30, 2021 to request that the Court permit Primed to file an exhibit previously marked Confidential under seal in support of its recently filed motion for summary judgment.

Primed respectfully submits that good cause exists for this request on the following grounds:

The Protective Order entered in this case, i.e., Dkt No. 29, states that:

“[P]roprietary or non-public information of a commercially, financially or personally sensitive nature such as confidential trade secrets, unpublished financial data, confidential business or products plans, or confidential customer information” that would pose a high risk of competitive harm, may be identified as CONFIDENTIAL or AEO/ATTORNEYS’ EYES ONLY-HIGHLY CONFIDENTIAL.

The Protective Order further states that:

All Confidential Information filed with the Court, and all portions of pleadings, motions or other papers filed with the Court that disclose such Confidential Information shall be filed under seal to the extent permitted by law (including, without limitation any applicable rules of court).

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As such, we respectfully request permission to file Exhibit J 1 to Primed's motion for summary judgment under seal. This document contains two previous exhibits attached to the declaration of Matthew Zeigler containing confidential business and customer information of Primed. Included in this exhibit is customer information including names, address, and purchase and sale data relating to pharmaceutical products.

We, therefore, respectfully request you enter this Exhibit J! be filed under seal in association with the previously filed Motion for Summary Judgment on Liability.

Respectfully submitted,
STERN & SCHURIN LLP

Richard S. Schurin

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